

1 Martha G. Bronitsky
2 Chapter 13 Standing Trustee
3 Po Box 5004
4 Hayward, CA 94540
5 (510) 266 - 5580

6 Trustee for Debtor(s)

7
8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 In re

12 Cara Pietrina Cordoni

13 Chapter 13 Case No. 18-40460-CN 13

14 debtor(s)

15 **Trustee's Motion and Declaration to**
16 **Dismiss or Convert Proceedings for Case Deficiencies and Notice Thereon**

17 TO DEBTOR(S) AND DEBTOR(S)' ATTORNEY OF RECORD:

18 Martha G. Bronitsky, Chapter 13 Standing Trustee, hereby moves the court for an Order Dismissing
19 or converting this case for cause pursuant to 11 U.S.C. §1307(c) based on unreasonable delay that it is
20 prejudicial to creditors: failure to cooperate with the Trustee in the investigation of the debtors assets by
21 failing to provide proof of ownership interest in properties listed on Schedule A/B. Section 1302 (b) (1)
22 citing Section 704 (a) (4).

23 The delay is unreasonable because the Debtor(s) is aware or should have been aware of these
24 requirements and the Trustee has previously requested these requirements be fulfilled.
25 Furthermore, the delay is prejudicial to creditors because disbursements cannot be made and
26 there is an automatic stay preventing collection efforts that would otherwise be available.

27 NOTICE IS HEREBY GIVEN that debtor or the attorney of record may request a hearing in
28 writing stating specific grounds for objecting to the dismissal or conversion of these proceedings to the
court and served on the trustee no later than twenty-one (21) days from the date of service of this motion.
Trustee will then schedule a hearing date and notice debtor and the attorney of record of said hearing
date.

1 I declare under penalty of perjury that the foregoing is true and correct.
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4 Date: August 14, 2018

5 /s/ Martha G. Bronitsky
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Signature of Martha G. Bronitsky
Chapter 13 Standing Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the registered agent for the creditor by depositing it in the United States mail with first class postage attached thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Cara Pietrina Cordoni Pro Per
2518 Encinal Ave (Counsel for Debtor)
Alameda, CA 94501

(Debtor(s))

Date: 8/14/2018

/s/ Selesia Fredotovich

Selesia Fredotovich